



South Coast Air Quality Management District

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Mr. James Goldstene
Executive Officer
California Air Resources Board
1001 "I" Street, 23rd Floor
Sacramento, CA 95814

Comments on the Proposed Amendments to the
Diesel Emission Control Strategy Verification Procedure

The South Coast Air Quality Management District (AQMD) staff appreciates the opportunity to provide support for the proposed amendments to the Diesel Emission Control Strategy Verification Procedure. We strongly support the amendments as they could potentially streamline the verification procedures, increase the number of emission control groups for which a verified technology or strategy could be applied, and ensure that emissions reductions are real, quantifiable, and permanent. In particular, the requirement to perform emission testing of technologies intended for use in variable-speed off-road applications under non-road transient test cycle is needed to ensure that a verified technology will achieve the same level of emissions reductions under real operating conditions.

We would urge your Board to adopt staff's proposal. If you have any questions regarding this matter, please contact Henry Hogo at (909) 396-3184.

Sincerely,

Barry R. Wallerstein, D.Env.
Executive Officer

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